



Department of Energy  
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059678

JUN 15 1998

Mr. Douglas R. Sherwood  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352-0539

Dear Mr. Sherwood:

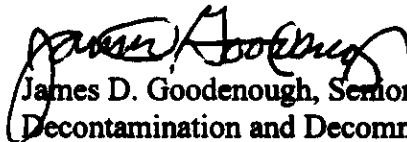
RESPONSES TO COMMENTS ON THE SAMPLING AND ANALYSIS PLAN (SAP) FOR  
RELEASE OF 105-C BELOW GRADE STRUCTURES AND UNDERLYING SOILS,  
DOE/RL-97-37, REV. 0

Please find attached, for you information, the U.S. Department of Energy, Richland Operations  
Office (RL), responses to comments provided by the U.S. Environmental Protection Agency  
(EPA) on the subject document.

The 105-C SAP was based on the "Guidance for Radiological Release of DOE Real Property  
Under Environmental Restoration Contractor (ERC) Management" (DOE/RL-97-93). The  
105-C SAP did not reference DOE/RL-97-93 since the document was still in the draft stage. The  
general model input parameters for RESRAD and RESRAD-BUILD is included in this guidance  
document. Based on discussions with EPA, the 105-C SAP will not be revised to incorporate the  
following comments, but they will be addressed in the final verification package.

If you want to discuss this matter further or require additional information, please contact  
Mr. Glenn Richardson at 373-9629.

Sincerely,

  
James D. Goodenough, Senior Project Manager  
Decontamination and Decommissioning Project

DDP:GR

Attachment

cc w/attach:  
J. W. Donnelly, Ecology  
D. A. Faulk, EPA

U.S. Department of Energy, Richland Operations Office (RL), responses  
to U.S. Environmental Protection Agency (EPA) comments on the  
Sampling and Analysis Plan (SAP) for Release of 105-C Below Grade Structures  
and Underlying Soils, DOE/RL-97-37, Rev. 0

**Comment 1:** The plan proposes the use of decay for a period up to 40 years, as stated in previous comments the use of decay is not appropriate.

**Response:** Based upon the actual 105-C contamination levels, decay is not an issue for the release of 105-C Lift Station and the other Below Grade Rooms and Tunnels (BGRT). Therefore, 105-C will proceed with the release of the 105-C Lift Station and BGRT without using decay in the RESRAD-BUILD model. However, RL reserves the right to discuss this issue further in conjunction with the resolution of comments for DOE/RL-97-93. This is an important policy call, which will have an impact on many future decommissioning projects on the Hanford Site.

**Comment 2:** The plan also makes reference to an exposure scenario used to calculate clean up values. Table 1-2 states that the values were calculated using a recreational scenario, however, later the text states that clean up values will be to a residential scenario. EPA requires the residential scenario to be used to determine clean up values. In addition, the plan should provide all model inputs.

**Response:** Table 1-2 was calculated using a residential scenario. The word "recreational" will be changed to "residential."

It is the intention of the 105-C Project to submit a verification package to EPA for approval similar to the 100 Area Remediation Projects, following the completion of the sampling and the subsequent RESRAD and RESRAD-BUILD analyses. The verification package will include all site-specific model input parameters, and will include or refer to DOE/RL-97-93 for all general model input parameters. Calculations to backup the verification package will be provided at EPA's request.

**Comment 3:** EPA agrees with the premise that the structure below 15 feet can be analyzed under the deep zone criteria; however, the rationale for why this is allowed should be provided.

**Response:** The rationale for the deep zone criteria is based on the scenario that there is no personal habitat below 15 feet. Therefore, the deep zone, 15 feet below grade, has two pathway scenarios (migration to groundwater and the drilling scenario).